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From: Jeff Coop [<mailto:gworthyhood@yahoo.com>]

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Posted To: Western Comments

Conversation: NPDES Phase II Stormwater Permit: Public Comment

Subject: NPDES Phase II Stormwater Permit: Public Comment

Department of Ecology:

The difference in thresholds between the Phase I and II Permits should be reconsidered. Wouldn't a one-acre threshold in Phase II municipalities versus a 5,000 square foot threshold in Phase I municipalities encourage urban sprawl? Isn't urban sprawl one of the main contributing factors to loss of salmon habitat, which in turn has led to listing of various salmon species under the Endangered Species Act? Because of irreparable habitat damage to habitat, a one acre threshold for flow control may be more appropriate in Phase I municipalities than in Phase II municipalities, where salmon and salmon habitat still have a chance to survive.

If the thresholds in Phase I municipalities are not higher than for Phase II municipalities, then they should at least be the same. Consistent thresholds for both Phase I and II municipalities should offer the same level of care for salmon restoration.

In conclusion, if the one acre threshold is being cited simply because it is the national standard set forth by EPA, it should be reconsidered since much of the nation has already lost quality fish habitat. Salmon habitat in Western Washington's Phase II municipalities should not be allowed to degenerate simply to achieve a national threshold standard.

Thank you for your consideration.

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